

CIRCUIT COURT FOR Howard County (CC), MARYLAND

City/County

Located at 9250 Judicial Way Ellicott City, MD 21043

Court Address

Telephone 410-313-2111Bala Jain, LLC
Plaintiff

vs.

Eagle Properties and Investments LLC, et al.
Defendant**NOTICE OF LIS PENDENS**
(Md. Rule 12-102(b))You are notified that on July 18, 2022 the suit in CL-2022-0009687
Date Case Numberwas instituted in the circuit court for Fairfax County Virginia Circuit Court
City/County

The following described real property is involved in this suit, namely, properly situated in

Howard County and described as:
City/County15474 Roxbury Rd., Glenwood, MD 21738; See Exhibit A - Legal Description attached.

Give address and the full legal description of real property.

The nature of the lien, right, or interest sought to be established or enforced is:

See Exhibit B attached for nature of the lien.7-25-2022

Date

Mark E. Shaffer
Signature of Plaintiff/Attorney1506020004
Attorney NumberMark E. Shaffer

Printed Name

8000 Towers Crescent Drive, Suite 1400

Address

Tysons Corner, Virginia 22182

City, State, Zip

Mark.Shaffer@offitkurman.com

E-mail

703-745-1800

Telephone

LR - Agreement
Recording Fee 20.00
Name: bala jain 11/22/24
Ref: 13
LR - Agreement
Surcharge 40.00
SubTotal: 60.00
Total: 60.00
08/09/2022 08:11
#16496652 CC0503 -
Howard Co Ellicott
City/CC05.03.07 -
Register 07
CC-CV-0827-06/2022

EXHIBIT A – LEGAL DESCRIPTION

All that lot of ground situate in the County of Howard, Maryland and more particularly described as follows:

Beginning for the same at a point on the Southeast side of the concrete body of the aforesaid Washington to Westminster Road, at a point where a stone formerly stood, at the end of the 3rd line of Lot No.1, containing 181 1/4 acres of land, more or less, which, in a cause in the Circuit Court for Howard County, in Equity, lately depending, entitled "Sallie E. Dorsey, et al. vs. Stephen B. Dorsey" was allotted to the said Sallie E. Dorsey, and running thence with and binding on the 4th and 5th lines of said lot, as now corrected for variation, and with part of the Western boundary of the lands belonging to Ann England Griffith, the two following courses and distances: (1) South 29 degrees 15 minutes East 511 112 feet, to a stake set in the ground, and (2) South 6 degrees 40 minutes West 309.37 feet, to a large maple tree; thence leaving the outlines of the original tract and the Western boundary of the land belonging to Ann England Griffith, and by two lines along the Northern boundary of the property formerly belonging to the late Stephen B. Dorsey, (3) South 70 degrees 35 minutes West 133 1/4 feet, to a white oak tree, and (4) South 58 degrees 32 minutes West 186 feet, to a stake set in the ground by a fence post; thence along the Northeastern edge of a small timber lot, (5) North 56 degrees West 133.9 feet, to a stake set in the ground; thence (6) North 68 1/2 degrees West 548.1 feet to and along the Northeastern edge of the aforesaid Bank's School House Road, also known as the road from Knollwood to Gleneig; thence along the Northeastern edge of said road, (7) North 9 degrees West 78.2 feet, to a point at the intersection of the center of said road with the Southeastern edge of the aforesaid Washington to Westminster Road, and thence running with and binding on the Southeastern edge of the Washington to Westminster Road, and also running with, or near, the 3rd line of Lot No. 1 aforesaid, as now corrected as aforesaid, (8) North 52 degrees 45 minutes East 877.1 feet, to the place of beginning; containing 10.86 acres of land, more or less.

Save and Except, Therefrom, (1) All that piece or parcel of land, which, by deed dated March 5th, 1952, and recorded among the Land Records of said Howard County in Liber

M.W. B. No. 230, Folio 524, etc., was granted and conveyed by Mary Elizabeth Dorsey, and others, to the State of Maryland, to the use of the State Roads Commission, and (2) all that piece or parcel of land, which, by deed dated March 20th, 1952, and recorded among said Land Records in Liber M.W.B. No. 231, Folio 56, etc., was granted and conveyed by the said Mary Elizabeth Dorsey, and others, to the State of Maryland, to the use of the State Roads Commission.

EXHIBIT B

The underlying action involves title to real estate and seeks relief in the form of imposition of a constructive trust based on Eagle Properties and Investments, LLC's ("Eagle") use of loans it obtained from Bala Jain, LLC that it used to improve and develop the real estate at issue. Bala Jain, LLC has filed a lawsuit against Eagle Properties and Investments, LLC, Amit Jain, Monika Jain, First Class Title, and Daniel Kotz. The lawsuit alleges that: Amit Jain, Monika Jain, First Class title and Daniel Kotz committed fraud and conspiracy to commit fraud in order to deceive Bala Jain, LLC to lend to Eagle \$7.5 million in loans to purchase, improve, and develop various real properties, including the real estate at issue (Counts I and II); Bala Jain is entitled to declaratory judgment that Eagle's failure to repay the loans combined with the other defendants to fraud entitles Bala Jain to imposition of a constructive trust on the real estate at issue (Count III); an accounting from all Defendants (Count IV); to disregard and pierce Eagle's corporate veil (Count V); and breach of contract against Eagle (Count VI) based . Plaintiffs claim damages of at least \$7,500,000.00, plus punitive damages and attorneys' fees.

*Information provided is for the use of the Clerk's Office, State Department of Assessments and Taxation, and County Finance Office Only.
(Type or Print in Black Ink Only—All Copies Must Be Legible)*

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